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APR 20 1993

before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D. C. 20554

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In the Matter of)
)
Amendment of the Commission's)
Rules to Establish a Single AM)
Radio Stereophonic Transmitting)
Standard)

ET Docket No. 92-298

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REPLY COMMENTS OF E. HAROLD MUNN, JR.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Preliminary: The undersigned, now of counsel to the firm of E. Harold Munn, Jr. & Associates, Inc., was actively engaged in the field of broadcast engineering for a period of more than forty-two years, retiring in November, 1992. Numerous rule-making proceedings have included comments prepared by the undersigned and now are a part of the body of regulation of AM, FM, TV and Cable Television facilities. Representation before the Commission in various proceedings has included applicants or proponents in all fifty of the states. It is from this rich background that these Reply Comments have been prepared.

These Reply Comments are directed to the Comments filed by Leonard R. Kahn on April 5, 1993.

1. Mr. Kahn rightly pointed out that almost 88% of the licensed AM Broadcast stations are not equipped for stereo operation. He failed to point out that the shift to "talk" programming and "narrowcasting" diminishes the need for stereo facilities on AM. He might well have noted that in an environment not requiring stereophonic reproduction, the adoption of a "standard" favoring one single system is not crucial nor is it even timely.

2. Mr. Kahn failed to point out the fact that the Kahn exciter is currently being utilized for stable sideband enhancement within the provisions of §73.44 of the Rules. The writer supervised the installation of a Kahn system for this purpose at WNZK, Dearborn Heights, Michigan, where it is operating today, day and night, meeting all the occupied spectrum criteria of the Rules. While Mr. Kahn speaks of the noncompliance problems of the Motorola system, as well as supporting his own, he was non-specific with respect to an operating station such as the one cited herein.

3. My office and residence are located in the greater Coldwater, Michigan, area. This is about 110 miles southwest of Detroit, 160 miles east of Chicago and 60 miles north of Ft. Wayne, Indiana. This location is typical of many of the more rural areas in the United States where the Class A (clear channel) station signals on AM have long been the only reliable nighttime AM service apart from the very limited coverage of locally licensed stations. Some pertinent observations are in order as they were not fully explored in the Comments filed by Mr. Kahn. Furthermore, he did not fully develop the expose' of the impact of "platform movement" on the ability to listen to Class A station signals in the areas removed from the immediate vicinity of the stations' transmitters. Finally, while referring to adjacent channel problems he did not fully develop the impact of adoption of a potentially interfering system as "standard" on the newly-activated 6 dB first adjacent channel protection requirement in §73.37 of the Commission's Rules.

- 3 -

a) WJR, Detroit, Michigan, a 50 kW Class A station on 760 kHz, is a primary source for news, sports and information programming over a wide area of Michigan, Indiana, Ohio and western

derogation of that band if a deficient system such as the Motorola stereo is adopted as the mandated standard.

4. Mr. Kahn has suggested that the Commission does not have the staff to study the current technical facts regarding AM stereo and he would place it with NIST. This may well be necessary. Certainly a "legal" settlement -- a lawyers' decision -- will not resolve technical problems. Indeed, this is an engineering matter which cannot be legislated in a technical vacuum. If it adopts the Motorola system as the stereo standard for AM, the Commission may well have issued the death knell for its avowed desire for AM migration to the expanded band and for the establishment of a group of AM stations idealized for their lack of interference, stereo and high fidelity operation and reliability of coverage. The action proposed in the NPRM could, if adopted, totally frustrate the Commission's intent when it provided for the expansion and migration to the new band.

5. Finally, Mr. Kahn has made a recommendation for further scientific study. This recommendation is supported. Precipitate action, envisioned in the NPRM, clearly is untimely. The Commission should marshall the available NIST and private industry resources and attack this problem with courage and determination. The pattern of successfully requiring receivers to be both AM and FM should be remembered. Every valid AM stereo system available now, in 1993, should be considered before a final decision or a limiting decision is made. There is no emergency!

